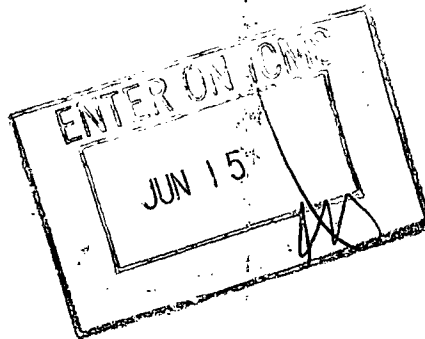


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FILED
JUN 12 12 04 PM '98
CENTRAL DISTRICT OF CALIF.
LOS ANGELES

9 UNITED STATES DISTRICT COURT
10 FOR THE CENTRAL DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA

12 Plaintiff,

13 v.

14 SERGUEI ADONIEV, et al.

15 Defendants.
16
17

No. CR 96-977-RAP

STIPULATED SENTENCING
RECOMMENDATION

18 Plaintiff UNITED STATES OF AMERICA, by and through its attorney of record,
19 Assistant United States Attorney Stephen G. Larson, and defendant SERGUEI ADONIEV, by
20 and through his counsel of record, Stephen D. London, Esq., hereby submit their joint, stipulated
21 sentencing recommendation in the above-referenced matter.

22 The parties concur with the factual findings, sentencing factors, and criminal history
23 classification set forth in the Probation Officer's Presentence Report ("PSR"). Specifically, both
24 the case settlement agreement and the PSR recommend a base offense level of 6 (U.S.S.G. §
25 2F1.1(a)), a 14-level increase for the amount of loss (U.S.S.G. § 2F1.1(b)(1)(O)), a 2-level
26 increase for more than minimal planning (U.S.S.G. § 2F1.1(b)(2)), and a 3-level reduction for
27 acceptance of responsibility (U.S.S.G. § 3E1.1). The resulting total offense level calculated by
28 the PSR is 19. With a criminal history category of I, defendant's sentencing range under the PSR

1 is 30-37 months.

2 In addition, the case settlement agreement calls for a further 2-level reduction based on
3 defendant's willingness to submit to voluntary deportation. Under the case settlement agreement,
4 defendant's total offense level is 17. With a criminal history category of I, defendant's sentencing
5 range is 24-30 months.

6 The parties agree that, given the circumstances of this case, the following sentence is
7 appropriate: Defendant should be (1) sentenced to 30 months incarceration; (2) ordered to pay a
8 fine of \$60,000, which defendant has already paid; (3) ordered to pay restitution in the amount of
9 \$4,040,780 to the government of Kazakhstan, \$1,000,000 of which defendant has already paid;
10 and, (4) following the term of incarceration, placed on supervised release for a period of 3 years.

11 Respectfully submitted,

12 DATED: June 10, 1998

13 NORA M. MANELLA
14 United States Attorney

15 DAVID C. SCHEPER
16 Assistant United States Attorney
17 Chief, Criminal Division

18 
19 STEPHEN G. LARSON
20 Assistant United States Attorney

21 Attorneys for Plaintiff
22 United States of America

23 DATED: June 10, 1998

24 
25 STEPHEN D. LONDON, Esq.

26 Attorney for Defendant
27 SERGUEI ADONIEV
28

CERTIFICATE OF SERVICE BY MAIL

I, JUDEE GUZMAN, declare:

That I am a citizen of the United States and resident or employed in Los Angeles County, California; that my business address is Office of United States Attorney, United States Courthouse, 312 North Spring Street, Los Angeles, California 90012; that I am over the age of eighteen years, and am not a party to the above-entitled action; That I am employed by the United States Attorney for the Central District of California who is a member of the Bar of the United States District Court for the Central District of California, at whose direction the service by mail described in this Certificate was made; that on **June 12, 1998**, I deposited in the United States mails in the United States Courthouse at 312 North Spring Street, Los Angeles, California, in the above-entitled action, in an envelope bearing the requisite postage, a copy of:STIPULATION RE: RECOMMENDATION

addressed to:
STEPHEN D. LONDON
1100 POYDRAS STREET, SUITE 2950
NEW ORLEANS, LOUISIANA 70163
504 582-2427

his/her last known addresses, at which place there is a delivery service by United States mail.

This Certificate is executed on **June 12, 1998**, at Los Angeles, California.

I certify under penalty of perjury that the foregoing is true and correct.


JUDEE GUZMAN